

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**JOINT CASE MANAGEMENT STATEMENT REQUIREMENTS FOR
MAGISTRATE JUDGE ALLISON H. GODDARD**

The parties must file a Joint Case Management Statement no later than ten calendar days before the initial Case Management Conference scheduled pursuant to CivLR 16.1.d that includes the following information:

1. Jurisdiction and Service: The basis for this Court’s subject matter jurisdiction over plaintiff’s claims and defendant’s counterclaims; whether any parties remain to be served; and a proposed deadline for service if any parties remain to be served.
2. Facts: A brief chronology of the facts and a statement of the principal factual issues in dispute.
3. Legal Issues: A brief statement, without extended legal argument, of the disputed points of law, including citations to specific statutes and relevant cases.
4. Motions: All past and pending motions relating to this case, their current status, and any anticipated future motions.
5. Amendment of Pleadings: The extent to which current parties, claims, or defenses are expected to be modified (i.e., added or dismissed), and a proposed deadline for amending the pleadings.
6. Evidence Preservation: A brief report certifying that the parties have reviewed the Checklist for Rule 26(f) Meet and Confer Regarding Electronically Stored Information (“ESI”), which can be found at <https://www.casd.uscourts.gov/Judges/goddard/docs/Goddard%20Electronically%20Stored%20Information%20Checklist.pdf>, and have met and conferred fully regarding the preservation and discovery of ESI. Any anticipated issues regarding ESI should be discussed.
7. Disclosures: Whether there has been full and timely compliance with the initial disclosure requirements of Fed. R. Civ. P. 26(a)(1). Parties should also state whether documents have been or will be produced.

8. Discovery: Discovery served to date, if any; the scope of anticipated discovery; any proposed limitations or modifications of the discovery rules; whether the parties have considered entering into a stipulated e-discovery order; a proposed discovery plan pursuant to Fed. R. Civ. P. 26(f)(3); and any identified discovery disputes.

9. Related Cases: Any related cases or proceedings pending before another judge of this Court, or before another court or administrative body.

10: Relief: All relief sought through complaint or counterclaim, including the amount of any damages sought and a description of the bases on which damages should be calculated. Additionally, any party from whom damages are sought must describe the bases upon which it contends damages should be calculated if liability is established.

11. Settlement: Summary of any formal or informal settlement discussions, including dates, participants, and outcomes.

12. Consent to Magistrate Judge for all Purposes: Whether all parties consent to have a magistrate judge conduct all further proceedings, including trial and entry of judgment.

13. Other References: Whether the case is suitable for reference to binding arbitration, a special master, or the Judicial Panel on Multidistrict Litigation.

14. Narrowing of Issues: Issues that can be narrowed by agreement or by motion; suggestions to expedite the presentation of evidence at trial (e.g., through summaries or stipulated facts); and any requests to bifurcate issues, claims, or defenses.

15. Scheduling: Proposed dates for expert disclosures, discovery and motion cutoffs, pretrial conference, and trial.

16. Trial: Whether the case will be tried to a jury or to the court, and the expected length of the trial.

17. Disclosure of Non-Party Interested Entities or Persons: If applicable, whether each party has filed a Notice of Party with Financial Interest required by CivLR 40.2.

18. Professional Conduct: Confirmation that all attorneys who will be listed in the pleadings or motions for any party have reviewed CivLR 83.4 and agree to abide by the Court's Code of Conduct.

19. Class Actions: If this case is intended to be a class action, provide a proposal for how and when the class(es) will be certified, and whether all attorneys of record for the parties have reviewed the Procedural Guidance for Class Action Settlements.

20. Patent Cases: Proposed modifications to the deadlines provided in the Patent Local Rules; the need for, and specific limits on, discovery relating to claim construction; and whether there is a need to phase damage discovery.

21. Other Matters: Any other matters that may facilitate the just, speedy, and inexpensive disposition of this matter.