

From: Sean Young
To: "Kristopher Armstrong"; Bridget E. Coontz; Halli Watson
Cc: Dale Ho; Drew Dennis; Freda Levenson; Naila Awan (awan.ns@gmail.com); Paul Moke (paul.moke@gmail.com); Raphael Davis-Williams
Subject: RE: Draft Rule 26(f) Report
Date: Monday, June 23, 2014 5:36:14 PM
Attachments: image003.png

Hi Kris,

Thanks for getting back to me so quickly with this draft. Plaintiffs agree to extend the initial disclosure deadline to June 30, 2014.

We look forward to discussing any remaining issues on the Rule 26(f) report on Wednesday.

Sean

From: Kristopher Armstrong [<mailto:Kristopher.Armstrong@ohioattorneygeneral.gov>]
Sent: Monday, June 23, 2014 4:46 PM
To: Sean Young; Bridget E. Coontz; Halli Watson
Cc: Dale Ho; Drew Dennis; Freda Levenson; Mike Brickner; Naila Awan (awan.ns@gmail.com); Paul Moke (paul.moke@gmail.com); Raphael Davis-Williams
Subject: RE: Draft Rule 26(f) Report

Sean,

Here are our proposed changes/additions to the 26f report. Please let me know if you have any questions or concerns about any of them. Unfortunately, I will be out all day tomorrow at depositions and Bridget is also out tomorrow, but we can confer on Wednesday morning in plenty of time to get this filed by the end of the day if needed.

Thanks,

Kris

Kristopher Armstrong
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From: Sean Young [<mailto:syoung@aclu.org>]
Sent: Wednesday, June 18, 2014 2:33 PM
To: Bridget E. Coontz; Kristopher Armstrong; Halli Watson
Cc: Dale Ho; Drew Dennis; Freda Levenson; Mike Brickner; Naila Awan (awan.ns@gmail.com); Paul Moke (paul.moke@gmail.com); Raphael Davis-Williams
Subject: Draft Rule 26(f) Report



Hi Bridget,

Attached please find a draft Rule 26(f) report. Please note that at this time, Plaintiffs do not intend to seek discovery pending resolution of our motion for preliminary injunction, which will be filed this month. Our intent is to ask that the motion be decided on the papers; we will seek to have oral argument but do not expect to present live testimony at the hearing. Accordingly, this draft Rule 26(f) report proposes discovery deadlines consistent with the typical timeline of a case.

However, Plaintiffs continue to believe that initial disclosures may impact our assessment of whether discovery is unnecessary pending resolution of the motion for preliminary injunction. We also agree that it need not be tethered to the motion for preliminary injunction briefing schedule. Therefore, the attached draft Rule 26(f) report proposes the exchange of initial disclosures on the ordinary Rule 26 deadline, which is two weeks after the parties' Rule 26(f) conference (6/24/14). Since the Rule 26(f) report is due the following day, the draft report indicates that the disclosures have already been exchanged.

We look forward to hearing from you,

Sean

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