

SCHEDULE A TO LOCAL RULE 21.3  
IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

	)	Case No. _____
Plaintiff,	)	
	)	
v.	)	Judge _____
	)	
	)	
Defendant.	)	

Pursuant to Local Rule 21.3, the following parties and counsel met and conferred on \_\_\_\_\_ regarding ESI:


Do the parties currently anticipate that the discovery of ESI is reasonably expected to be required in this case?

Y                      N

If so, did the parties discuss the following:

The general nature of any ESI reasonably believed to be potentially relevant, the location where it is stored, and whether any party believes it should be preserved or should be subject to a litigation hold.

Y                      N

The scope and nature of the efforts each party will take to identify and preserve potentially relevant ESI.

Y                      N

The scope of email discovery and any protocol for searching emails for production.

Y                      N

The scope of production of metadata and embedded data.

Y                      N

The scope of any search of, and production of ESI contained on, back-up or archival systems.

Y N

Whether any ESI in a party's possession is not reasonably accessible or subject to production without undue burden.

Y N

Whether and how the parties intend to allocate the costs of preservation, collection and production of ESI.

Y N

The form and format in which ESI shall be produced.

Y N

Whether the parties will enter any confidentiality agreement, protective order, "quick peek" agreement or "clawback" agreement, as provided for in section (D) of this Rule.

Y N

Did the parties reach any agreement on any issues?

Y N

If the parties reached any agreements, summarize the agreements below or attach any written agreements that have been entered.

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Do the parties currently anticipate that any issues regarding ESI will require resolution by the Court?

Y N

If the parties currently anticipate that issues regarding ESI will require resolution by the Court, summarize those issues.

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Respectfully submitted,

\_\_\_\_\_  
Counsel for Plaintiff

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Counsel for Defendant