[CASE NAME & NUMBER]

To assist the Court in more efficiently addressing the parties’ discovery dispute(s), the parties shall meet and confer, and jointly complete the following chart. The purpose of this chart is to succinctly state each party’s position and the last compromise offered when the parties met and conferred. The fully completed chart shall be e-mailed to chambers at [zwart@ned.uscourts.gov](mailto:zwart@ned.uscourts.gov).

|  |  |
| --- | --- |
| The moving party is: |  |
|  |  |
| The responding party is: |  |

**Note:**  If discovery from both parties is at issue, provide a separate sheet for each moving party.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Discovery Request at Issue** | **Relevant to prove...** | **Moving Party’s Initial Position** | **Responding Party’s Initial Position** | **Moving Party’s Last Offered Compromise** | **Responding Party’s Last Offered Compromise** | **Court’s Ruling** |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

|  |  |
| --- | --- |
| Counsel for [Plaintiff]: |  |
|  |  |
| Counsel for [Defendant]: |  |

Date: Click here to enter a date..