

1. **No Written Discovery Motions.** **NO WRITTEN DISCOVERY MOTIONS WILL BE ACCEPTED. THE COURT WILL ADDRESS ALL DISCOVERY DISPUTES WITH AN IN-PERSON DISCOVERY HEARING INSTEAD OF WRITTEN MOTIONS.** The purpose of this procedure is to ensure expedited and inexpensive resolution of discovery disputes. The following procedures will be in effect in this case:

- a. The Court prefers that discovery disputes are expeditiously resolved between the parties. To the extent resolution cannot be reached between the parties, the Court prefers to resolve the dispute in a timely matter. The Court does not appreciate parties who procrastinate the resolution of discovery disputes.
- b. If there is a discovery dispute, the attorneys are expected to confer in a meaningful way, consistent with the provisions of this Order, to try to resolve it.
- c. If counsel cannot resolve the dispute, counsel shall place a joint conference call to the division staff at 303-606-2425 to schedule an in-person hearing on the Court’s calendar, preferably within one week of the parties being unable to resolve the discovery dispute.
- d. If counsel are unable to jointly call the division staff, the attorney contacting the staff should have available dates on opposing counsel’s calendar. If opposing counsel does not cooperate in scheduling a hearing, advise the staff of the efforts made to obtain their input and the Court will set a hearing accordingly.
- e. With regard to written discovery, once the matter is set, the parties must jointly prepare a discovery dispute chart at least 48 hours before the hearing that contains a summary of the nature of the dispute. The elements of the chart are as follows:

No./Type of Discovery Request	Disputed Response(s) or Objection(s)	Problem(s) with Response(s) and Relevant Authority	Justification for Response(s) and Relevant Authority

- f. Parties shall not include lengthy legal or factual arguments in the discovery dispute chart. One or two sentences about the relevance of the cited authority will be sufficient. Be prepared to present a more thorough argument at the hearing. While the drafting of the discovery dispute chart should be completed

collaboratively, the moving party shall file the discovery dispute chart. Do not submit documents for in camera review without first obtaining permission to do so by the Court.

- g. The dispute will be argued and resolved at the hearing or taken under advisement with a prompt ruling by the Court.
- h. If the dispute involves a deposition, counsel shall jointly place a call to the Court's clerk and to inform the Court that the parties have a dispute about taking a deposition or about deposition conduct. The Court will use its best efforts to resolve the deposition-related dispute in a timely fashion.
- i. Failure to follow these procedures will result in a denial of a hearing until such time as the applicable procedures are followed.