

Hon. Jeffrey Alker Meyer, U.S. District Judge
INSTRUCTIONS FOR DISCOVERY DISPUTES

All discovery issues should be resolved in good faith by counsel in accordance with their obligations to the Court under the Federal Rules of Civil Procedure and the Local Rules of the District of Connecticut. Before filing any motion relating to discovery, the parties are required to confer jointly with the Court by telephone and must comply with the following requirements:

1. Counsel for parties to discovery disputes must jointly contact Judge Meyer's Chambers to set up a date and time for the telephonic conference. Except in extraordinary circumstances, Chambers staff will not entertain a request to schedule a telephonic conference unless counsel for all parties to the discovery dispute are on the telephone when the request is made to Chambers so that a date and time for the conference can be mutually selected at that time.
2. Before contacting Chambers to schedule a telephonic discovery conference, counsel for parties to any discovery dispute are required by Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local Rule 37(a) to have conferred with one another and to have made a good faith effort to eliminate or reduce the area of controversy. Judge Meyer interprets these rules to require counsel to confer either *by meeting in person or by telephone*; mere exchanges of email, voicemail, or correspondence are not sufficient in and of themselves to satisfy counsel's good faith conference obligations. At the outset of the telephonic discovery conference, Judge Meyer will require counsel for each party to the discovery dispute to certify orally that they have complied with their good faith conference obligations under the Federal Rules and Local Rules.
3. Before seeking a telephonic discovery conference, counsel for all parties to a discovery dispute must also agree upon the issues that they intend to raise with Judge Meyer and inform Chambers of those issues at the time the telephonic conference is scheduled. If the parties cannot in good faith agree upon the issues to be raised with Judge Meyer, they shall so notify Chambers when they request a telephonic discovery conference.
4. If the dispute involves a written interrogatory, request for production, request for admission, deposition notice and/or subpoena (the "discovery request"), counsel for the party who served the discovery request at issue will, immediately following the telephone call requesting the conference, provide Chambers via facsimile or e-mail with a copy of the particular discovery request at issue and the opposing party's written response to that particular request. All such communications must be copied to opposing counsel. Judge Meyer does not need the entire discovery request and response but requires only the particular portions of the discovery request and response at issue. Before sending a copy of the disputed request(s) and response(s) to Chambers, counsel for the party seeking to send the disputed request must inform Chambers of counsel's intent to send Chambers a copy of the disputed request.

5. Other than the request at issue, Judge Meyer does not wish to receive any briefs, documents, deposition transcripts, correspondence or written argument regarding the discovery issue in dispute. If Judge Meyer wishes to receive briefing or other papers, he will alert the parties and establish a briefing schedule during the telephonic discovery conference.
6. Counsel should agree in advance on which party will be responsible for instituting the telephonic discovery conference. Counsel should not contact Judge Meyer's Chambers until counsel for all parties to the discovery dispute are on the telephone. Failure to participate in a scheduled telephonic discovery conference may result in the imposition of sanctions.
7. Should the Court issue any order following the telephonic conference, the party against whom the order is directed shall comply within 14 days pursuant to Local Rule 37(d).