

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RULES FOR DISCOVERY CONFERENCES IN CASES BEFORE JUDGE CHATIGNY

The standard scheduling order in cases assigned to Judge Chatigny provides as follows:

"All discovery issues should be resolved in good faith by counsel in accordance with their obligations under the Federal and Local Rules of Civil Procedure. Before filing any motion relating to discovery, the parties are required to jointly confer with the Court by telephone, 860-240-3659."

When counsel want to confer with Judge Chatigny regarding discovery disputes, the following rules apply:

1. Counsel must jointly contact Chambers to arrange a date and time for a conference. Counsel for all parties to the discovery dispute must be on the telephone when the request is made to Chambers.
2. Before contacting Chambers to schedule a conference, counsel are required by Rule 37(a)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 37(a)(2) to confer and make a good faith effort to eliminate or reduce the area of controversy. All discovery issues should be resolved in good faith by counsel in accordance with their obligations under these Rules. Judge Chatigny interprets the good faith conference obligation to require counsel to confer face-to-face or by telephone; exchanges of correspondence are not sufficient to satisfy counsel's good faith conference obligations.
3. Before seeking a discovery conference, counsel for all parties to the discovery dispute must agree on the issues they intend to raise and inform Chambers of those issues at the time the conference is scheduled. If the parties cannot in good faith agree on the issues to be raised, they must notify Chambers when they request a conference.
4. If the dispute involves an interrogatory, request for production, request for admission, deposition notice or subpoena (the "discovery request"), counsel for the party who served the discovery request will, immediately following the telephone call requesting the conference, provide Chambers via email with a copy of the discovery request and the opposing party's written response to that request. Judge Chatigny does not need the entire discovery request and response but requires only the particular portions of the discovery request and response at issue.

5. No materials will be submitted in advance of the conference other than the discovery request at issue. If Judge Chatigny requires briefs or other papers, a briefing schedule will be set during the conference.

6. Counsel must agree in advance on which party will be responsible for initiating the telephone call to Chambers for the conference. Counsel should not contact Chambers until all counsel are on the telephone..