

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

JORDAN REYES,	:	CASE NO. 2025 CV 01254
1400 CLIFTON AVE.	:	
CINCINNATI, OHIO 45220	:	JUDGE OLIVIA D. EDWARDS
Plaintiff,	:	
 	:	
v.	:	<u>JOINT DISCOVERY PLAN OF THE</u>
DANTE MILES,	:	<u>PARTIES</u>
3214 BELMONT PARK DR.	:	
DAYTON, OHIO 45424	:	
Defendant.	:	
	:	
	:	

Now comes all parties to this case, by and through their respective counsel, and hereby jointly submit to the Court this proposed Joint Discovery Plan, pursuant to Rule 26(f) of the Ohio Rules of Civil Procedure.

A. ATTENDANCE AT RULE 26(F) CONFERENCE

Pursuant to Civ.R. 26(f), the parties conducted their discovery conference on March 5, 2026, via Zoom and attended by counsel for Plaintiff and counsel for Defendant.

B. RULE 26(B) INITIAL DISCLOSURES

The parties shall exchange their initial disclosures required by Civ. R. 26(B)(3)(a) by March 15, 2026.

C. PROPOSED DEADLINES

The parties recommend the following deadlines be adopted and implemented:

- a. Plaintiff's deadline to disclose expert witness lists: April 1, 2026; reports, if any, shall be produced by April 15, 2026.
- b. Defendant's deadline to disclose expert witness lists: April 15, 2026; reports, if any, shall be produced by May 1, 2026.
- c. Depositions shall be scheduled and completed prior to May 8, 2026.
- d. Discovery cutoff: May 10, 2026
- e. Dispositive motions deadline: May 15, 2026
- f. The parties will be ready to mediate the case on or around early May 2026.

D. SCOPE OF DISCOVERY

It is anticipated that discovery will largely focus on the nature and extent of the injuries and damages claimed by Plaintiff. The parties do not believe discovery needs to be conducted in phases. Discovery is expected to include interrogatories, requests for production of documents, requests for admissions, and depositions as permitted under the Ohio Rules of Civil Procedure.

E. ELECTRONICALLY STORED INFORMATION

The parties have discussed issues relating to disclosure, discovery, and preservation of electronically stored information, including the form(s) in which it should be produced. Counsel have conferred and agree this case does not present any unusual issues involving electronically stored information.

F. PUBLIC RECORD REQUESTS

Counsel have conferred and do not believe this case involves any unusual issues involving public record requests.

G. CLAIMS OF PRIVILEGE OR PROTECTION

Counsel have conferred and do not believe this case presents any unusual issues of privilege or the work-product doctrine. The parties do not anticipate the need for a confidentiality agreement or protective order regarding sensitive information at this time.

H. LIMITATIONS ON DISCOVERY

The parties do not believe that any changes need to be made to the limitations on discovery already put in place by either the Ohio Rules of Civil Procedure or the local rules.

I. SETTLEMENT

A settlement demand has not been made at this time.

SIGNATURES:

Attorney for Plaintiff

Counsel for Jordan Reyes

Bar #31254

Attorney for Defendant

Counsel for Dante Miles

Bar #12345

Dated: March 8, 2026

Respectfully submitted,

/s/ David B. Shelby

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Attorney for Dante Miles

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 8, 2026, a copy of the foregoing document was electronically filed with the Clerk of Court by using the ECF system which will send notice of electronic filing to the following:

John C. Pryor, Esq.
1250 Beech Street
Cincinnati, Ohio 45202
Attorney for Plaintiff

/s/ David B. Shelby

David B. Shelby, Esq. (12345)