

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): TELEPHONE NO.: _____ FAX NO. (Optional): _____ ATTORNEY FOR (Name): _____	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO <input type="checkbox"/> CENTRAL DIVISION, CIVIL, 330 W. BROADWAY, ROOM 225, SAN DIEGO, CA 92101 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., VISTA, CA 92081	
PLAINTIFF	JUDGE:
DEFENDANT	DEPT
STIPULATION FOR DISCOVERY DETERMINATION FOLLOWING INFORMAL DISCOVERY CONFERENCE	CASE NUMBER

The above entitled case has been referred to Judge _____ for an Informal Discovery Conference (IDC) and potential determination of the outstanding referred discovery issues.

With such referrals, the judge will conduct an IDC as set forth in paragraph a. below. Upon stipulation of the parties, the court will schedule a prompt dispositive hearing on the discovery dispute following the IDC, as set forth in paragraph b. below:

- a. The judge will hold an IDC on the referred discovery dispute. The parties shall each electronically file a brief no more than five pages in length outlining the areas in dispute at least five days before the IDC. During the IDC, the court shall spend time with the parties and attempt to come to an amicable resolution of the discovery dispute. If the matters are not resolved, the court and parties will either promptly schedule a hearing to resolve the dispute following the process set forth in paragraph b. below, or the case will be referred back to the Independent Calendar department for a noticed motion hearing in due course.
- b. Upon stipulation of the parties, the judge hearing the IDC will promptly schedule a hearing to rule on the disputed discovery issues. With such disputed matters, the parties will follow a modified concise Separate Statement process (Code of Civil Procedure §§ 2030.300(b)(2), 2031.310(b)(3), and 2033.290(b)(2)). This shall include grouping similar discovery requests by category rather than separately listing each discovery request. The parties shall electronically file a concise separate statement with the court at least five days before the hearing. The moving party will first prepare the separate statement and provide the request, the objections, and moving party's position as to why further responses are required. Responding party will then provide the basis of the objections which moving party will incorporate into the separate statement along with moving party's reply. The parties, in addition, may file up to five pages of points and authorities and a brief declaration regarding sanction requests not to exceed three pages. The timeline for the completion of the separate statement and dispositive hearing will be decided upon in the IDC. Courtesy copies of any documents electronically filed for the discovery dispute must be delivered to the department.

The goal of the separate statement is to have one concise document that encompasses the matters in dispute. The court will not consider overly lengthy or repetitive arguments in a separate statement as the purpose of this process is expeditious resolution of discovery disputes so the parties can prepare for trial in a timely fashion. The court will rule on all the referred discovery disputes including requests for sanctions.

SHORT TITLE	CASE NUMBER
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By signing below, the attorneys/parties stipulate to a dispositive hearing following the IDC on the dispute following the process as set forth above. The parties understand, agree, and waive their rights to the full noticed motion process for the resolution of these disputes contained in the Civil Discovery Act.

The following parties so stipulate:

Date: _____

Type or print name

Signature of Attorney

Date: _____

Type or print name

Signature of Attorney

Date: _____

Type or print name

Signature of Attorney

Date: _____

Type or print name

Signature of Attorney