

# **Amoco Corp.'s Litigation Work Plan**

**Plaintiff V. Defendant**

## **I. Litigation Background**

- A. Nature of the Case (Brief Description)
- B. Forum/Judge/Jury Demand?
- C. Plaintiff's Claims/Relief Sought
- D. Major Court Deadlines/Trial Schedule?
- E. Principal Legal Issues?
- F. Principal Factual Issues?
- G. Total Fees and Disbursements Billed This Calendar Year? To Date?

## **II. Proposed Litigation Strategy**

- A. Describe Proposed Strategy for Resolving the Litigation
  - 1. Identify the key litigation objectives
  - 2. Describe proposed plan for achieving those objectives
  - 3. Describe opponent's anticipated strategy and plan for resolving
- B. Is This Case a Candidate for Early Resolution by Dispositive Motion?
  - 1. Describe proposed plan for early resolution.
- C. Is this Case a Candidate for ADR?
  - 1. If not, explain why
  - 2. Proposed ADR procedure and plan for implementing
- D. Is This Case a Candidate for Early Settlement
  - 1. If not, explain why
  - 2. Proposed settlement technique and plan for implementing

3. Preliminary estimate of reasonable settlement value

### **III. Proposed Plan of Work**

#### A. Work Directed to the pleadings

1. Drafting pleadings
2. Motions and briefings
3. Preliminary legal research
4. Initial fact investigation
5. Opponent's anticipated activity

#### B. Discovery of Facts

1. Interrogatories
2. Document Requests and productions
3. Admissions
4. Other written discovery
5. Deposition of fact witnesses
6. Opponent's anticipated activity

#### C. Anticipated Third Party Discovery

#### D. Anticipated Role of Consultants and Expert Witnesses

#### E. Other Legal Research

#### F. Summary Judgment Motion and Briefing

#### G. Anticipated Pretrial Preparation

#### H. Trial