IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

|  |  |  |  |
| --- | --- | --- | --- |
| |  | | --- | | {plaintiff\_name},  {plaintiff\_number},  vs.  {defendant\_name},  {defendant\_number}. |   \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | )  )  )  )  )  )  )  )  )  )  ) | CASE NO. {case\_number}  **PLAINTIFF’S RULE 26.01 INTERROGATORIES** |

{county\_name\_allCaps} DIVISION

1. **A short statement of the facts of the case.**
2. **The names of fact witnesses likely to be called by the party and a brief summary of their expected testimony.**
3. **The names and subject matter of expert witnesses (if no witnesses have been identified, the subject matter and field of expertise should be given as to experts likely to be offered).**
4. **A summary of the claims or defenses with statutory and/or case citations supporting the same.**
5. **Absent specific instructions from the assigned judge, the parties shall propose dates for the following deadlines in Local Civil Rule 16.02:**
   1. **Exchange of Fed. R. Civ. P. 26(a)(2) expert disclosures, and**
   2. **Completion of discovery.**
6. **The parties shall inform the court whether there are any special circumstances that would affect the time frames applied in preparing the scheduling order. See generally Local Civil Rule 16.02(c) (Consent of Scheduling Order).**
7. **The parties shall provide any additional information requested in the Pre-Scheduling Order (Local Civil Rule 16.01) or otherwise requested by the assigned judge.**

Respectfully Submitted,

{footer\_firm\_name}

*{s\_attorney\_filing}*

{footer\_attorney\_1\_name\_bar}

{footer\_attorney\_2\_name\_bar}

{footer\_attorney\_3\_name\_bar}

{footer\_address\_1}

{footer\_address\_2}

{footer\_telephone}

{footer\_facsimile}

{footer\_attorney\_1\_email}

{footer\_attorney\_2\_email}

{footer\_attorney\_3\_email}

Attorneys for Plaintiff

{footer\_city\_state}

{filing\_date}