

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

DR. JULIUS J. LARRY, III

PLAINTIFF

v.

CASE NO. 4:18-cv-116-KGB

STATE OF ARKANSAS, *et al*

DEFENDANTS

AMENDED JOINT FEDERAL RULE OF CIVIL PROCEDURE 26(f) REPORT

Come now, jointly all parties involved in this case and pursuant to this Court's Order (Doc. No. 30) do hereby submit the following information in compliance with Federal Rule of Civil Procedure Rule 26(f) and Local Rule 26.1.

1. Any changes in timing, form, or requirements of mandatory disclosures under Federal Rule of Civil Procedure Rule 26(a).

RESPONSE: No.

2. Date when mandatory disclosures were or will be made.

RESPONSE: On or before May 14, 2018.

3. Subjects on which discovery may be needed.

RESPONSE: Plaintiff will seek details involving all aspects of the Defendant's denials of Plaintiff's allegations, information regarding Defendant's lay and expert witnesses, and other issues that may become evident during discovery. The Defendant plans to explore the full range of Plaintiff's allegations, including the alleged basis for Defendant's liability and Plaintiff's claim for relief.

4. Whether any party will likely be requested to disclose or produce information from electronic or computer-based media.

RESPONSE: Plaintiff and Defendant anticipate seeking disclosure of computer-based information. As such, the parties further state:

a. whether disclosure or production will be limited to data reasonably available to the parties in the ordinary course of business;

RESPONSE: It is anticipated that the sought disclosures will be data reasonably available to Plaintiff and Defendant.

b. the anticipated scope, cost and time required for disclosure or production of data beyond what is reasonably available to the parties in the ordinary course of business;

RESPONSE: The parties are unable to determine if such production will be required, but if such production becomes necessary, the parties will timely inform the Court.

c. the format and media agreed to by the parties for the production of such data as well as agreed procedures for such production;

RESPONSE: Information that is stored electronically will be provided in the format in which it is ordinarily kept.

d. whether reasonable measures have been taken to preserve potentially discoverable data from alteration or destruction in the ordinary course of business or otherwise; and

RESPONSE: Yes.

e. other problems which the parties anticipate may arise in connection with electronic or computer-based discovery.

RESPONSE: None at this time.

5. Date by which discovery should be completed.

RESPONSE: Friday September 28, 2018.

6. Any needed changes in limitations imposed by the Federal Rules of Civil Procedure.

RESPONSE: No

7. Any Orders, e.g. protective orders, which should be entered.

RESPONSE: No.

8. Any objections to initial disclosures on the ground that mandatory disclosures are not appropriate in the circumstances of the action.

RESPONSE: No.

9. Any objections to the proposed trial date.

RESPONSE: No.

10. Proposed deadline for joining other parties and amending the pleadings.

RESPONSE: June 1, 2018.

11. Proposed deadline for completing discovery.

RESPONSE: Friday September 28, 2018.

12. Proposed deadline for filing motions.

RESPONSE: Friday October 12, 2018.

Respectfully submitted jointly by all parties,

/s/ Vincent P. France
Vincent P. France

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Certificate of Service

I, Vincent P. France, hereby certify that on May 4, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I, Vincent P. France, hereby certify that on May 4, 2018, I mailed the foregoing document by U.S. Postal Service to the following non-CM/ECF participant:

Julius J. Larry, III
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/s/ Vincent P. France
Vincent P. France