

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

JENELLE ALVERSON,)	CASE NO. CV-2020-06-1676
)	
Plaintiff,)	
)	JUDGE SUSAN BAKER ROSS
vs.)	
)	
THE AKRON ART MUSEUM, <i>et al.</i> ,)	
)	
Defendants.)	
)	

CIV.R. 26(F) DISCOVERY PLAN

Pursuant to Ohio Rules of Civil Procedure 26(F), a meeting was held on September 24, 2020 and was attended by:

Claire Wade-Kilts, Esq., counsel for Plaintiff Jenelle Alverson,

Ann E. Knuth, Esq. and Rachel E. Kolecky, Esq., counsel for Defendants The Akron Art Museum and Mark Masuoka.

Counsel represent that, during the meeting, they engaged in a meaningful attempt to meet and confer on the matters outlined below.

A. INITIAL DISCLOSURES

Have the parties agreed to make initial disclosures? **Yes. Initial disclosures shall be made by October 21, 2020.**

B. AGREED-UPON DEADLINES FOR DISCOVERY

Mediation	January 2021
Discovery Cut-Off	February 26, 2021
Plaintiff's Expert Report Deadline	February 26, 2021
Dispositive Motion Deadline	March 31, 2021
Defendants' Expert Report Deadline	April 30, 2021

C. SUBJECTS ON WHICH DISCOVERY MAY BE NEEDED

The parties anticipate that discovery will be needed on all facts surrounding the employment relationship of Jenelle Alverson and the Akron Art Museum

D. DISCLOSURE ISSUES/ESI

The parties do not anticipate ESI will be an issue.

E. PUBLIC RECORDS REQUESTS

The parties do not anticipate public records requests will be an issue.

F. ISSUES REGARDING CLAIMS OF PRIVILEGE OR PROTECTION AS TRIAL-
PREPARATION MATERIALS

The parties anticipate no issues.

G. CHANGES TO BE MADE TO LIMITATIONS ON DISCOVERY

None.

H. OTHER ORDERS COURT SHOULD ISSUE

None.

Signatures:

/s/ Claire I. Wade-Kilts (per email consent
on 09/25/20)

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*Attorneys for Defendants
The Akron Art Museum and Mark T. Masuoka*

Date: September 25, 2020