



1 (1) The parties shall meet-and-confer regarding the narrowed requests for production by July  
2 28, 2017. Respondent shall identify with specificity, by July 26, 2017, any objections  
3 to those discovery requests as narrowed.

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5 (2) The parties shall file, by August, 10, 2017, a joint statement regarding each discovery  
6 request for which a dispute exists. That joint statement must **separately address each**  
7 **disputed request**, providing the text of the request, the specific objections to it,  
8 Respondent's arguments supporting each objection, and then Petitioners' arguments  
9 opposing each objection. *Cf.* C.D. Cal. Local Rule 37-2.1 (outlining similar procedure  
10 for presenting discovery disputes in the form of joint stipulations).<sup>1</sup> Because this is a  
11 joint submission, the page limitations established in the local rules shall not apply. To  
12 the extent necessary, the joint statement shall attach any declarations or exhibits that the  
13 parties wish to be considered.<sup>2</sup> As the original movants, Docket No. 1, Petitioners shall  
14 be responsible for compiling and filing the joint statement, and the parties shall confer  
15 on the best mechanism for accomplishing that. *Cf.* C.D. Cal. Local Rule 37-2.2.

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17 (3) As noted previously, the Court finds that the arguments regarding any dispute related to  
18 deposition topics are not well-developed. *See* Docket No. 57 at 6-7. To the extent a  
19 dispute exists regarding deposition topics, that dispute shall be included in the above  
20 meet-and-confer and shall be addressed in the joint statement in the manner outlined  
21 above (*i.e.*, the joint statement shall include separately for each disputed deposition topic  
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24 <sup>1</sup> To be clear, the parties must meaningfully address each objection with citation to legal authority.  
25 Merely identifying an objection will not suffice. *Cf. Kor Media Group, LLC v. Green*, 294 F.R.D. 579, 582  
26 n.3 (D. Nev. 2013) (courts may deem waived arguments that are not meaningfully developed). The joint  
statement must be complete in itself. The parties may not incorporate by reference arguments made  
elsewhere.

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28 <sup>2</sup> The parties may not simply cite to the docket of either this case or the Illinois case, and instead must  
attach a copy of any exhibit that they believe should be considered.

1 the text of the topic, the specific objections to it, Respondent's arguments supporting  
2 each objection, and Petitioner's arguments opposing each objection).

- 3  
4 (4) Petitioners shall deliver two courtesy copies of the joint statement (and any declarations  
5 and exhibits attached thereto) to the undersigned's box in the Clerk's Office by 3:00 on  
6 August 11, 2017.

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8 IT IS SO ORDERED.

9 DATED: July 21, 2017

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NANCY J. KOPPE  
United States Magistrate Judge