

Rule 3.04 (FRCP 37) Motions Concerning Discovery and Disclosure.

(A) The Court will not consider any motion relating to discovery and disclosure unless it contains a statement that movant's counsel has conferred in person or by telephone with the opposing counsel in good faith or has made reasonable efforts to do so, but that after sincere efforts to resolve their dispute, counsel are unable to reach an accord. This statement also shall recite the date, time and manner of such conference, and the names of the individuals participating therein, or shall state with specificity the efforts made to confer with opposing counsel.

(B) Any motion relating to a deposition, including but not limited to a motion to quash or modify a deposition subpoena or for a protective order, shall be filed before the deposition date unless a belated notice of deposition renders this deadline impracticable.

(C) Upon the filing of a motion to compel, the Court may summarily overrule an objection to any discovery request if the objection is not stated in detail.