

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Troy Kenneth Scheffler,

Case No: 62-CV-25-6308

Plaintiff,

Judge: Laura Nelson

vs.

Ramsey County, a political subdivision of
the State of Minnesota,Bob B. Fletcher, in his official capacity as
Ramsey County Sheriff and MGDPA
Responsible Authority,**JOINT DISCOVERY PLAN**

And

Tim Gulden, in his official capacity and
Ramsey County Sheriff's Office MGDPA
Designee,

Defendants.

The parties/counsel identified below participated in the meeting required by Minn. R. Civ.

P. 26.06 on October 10, 2025, and prepared the following discovery plan:

1. Rule 26.06(c)(1) Timing of Required Disclosures

- a. Initial Disclosures – 30 days after service of Answer, or **November 7, 2025; (Plaintiff disputes the timeliness of Defendant as expressed in filed memorandum, believes the Defendants are in violation of rule 26.01(a)(3), and reserves that argument.)**
- b. Plaintiff's expert disclosures – **105 days before trial;**
- c. Defendant's expert disclosures – **60 days before trial;**
- d. Witness Lists, Exhibit Lists, Designate Deposition testimony for trial – **within 21 days of trial;**

- e. Expert Depositions – need not be completed before the close of discovery.

2. Rule 26.06(c)(2) Discovery Subjects and Timing:

Discovery will include materials related to liability and damages regarding the remaining Claim 1 of Plaintiff's complaint. The parties expect discovery to be completed within six months.

3. Rule 26.06(c)(3) Electronic Data

The parties will initially disclose electronically stored information in PDF format, if feasible. Native electronic data and information will be available upon request from the opposing party during the litigation. The parties anticipate that the County will handle and produce ESI in accordance with standard practices.

4. Rule 26.06(c)(4) Privilege

The parties do not anticipate that any of these issues will arise. The parties agree to address these issues with the Court by the procedures outlined in the Minnesota Rules of Civil Procedure should they arise. The parties reserve the right to seek a protective order. The parties agree that privilege logs will not be required for confidential communications between attorneys and clients occurring with preparation for or during litigation of the claims asserted by any party in this matter. The parties agree that communications between Ramsey County agencies and personnel and the Ramsey County Attorney's Office are presumptively privileged. The parties agree that communications between Ramsey County agencies or personnel and state agencies investigating conduct are not attorney-client privileged.

5. Rule 26.06(c)(5) Limits on Discovery

Given the nature of this case, Defendants request to place the following limits on discovery:

1. Limit the number of interrogatories that either party may serve to a total of 25;
2. Limit the number of Requests for Admission that either party may serve to a total of 25;
3. In lieu of having Sheriff Bob Fletcher be deposed, the County will designate a 30.02(f) witness to testify on behalf of the Ramsey County Sheriff's Office;
4. All depositions will be conducted remotely by Zoom.

Plaintiff requests the following:

1. Leave the number of interrogatories that either party may serve to a total of 50 as stated under rule;
2. Limit the number of Requests for Admission that either party may serve to a total of 50.

The parties reserve their right to request other limits on discovery, as appropriate.

6. Any other orders that the court should issue under Rule 26.03 or under Rule 16.02 and 16.03:

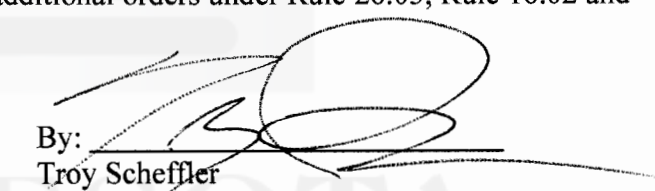
The parties request the Court issue a scheduling order pursuant to Rule 16.02 that includes the following deadlines (Plaintiff disputes the Initial Disclosures deadline as untimely):

| Deadline | Current |
|-------------------------|--------------------------|
| Initial Disclosures | November 7, 2025 |
| Fact Discovery | April 10, 2026 |
| Non-Dispositive Motions | May 11, 2026 |
| Initial Expert Reports | June 1, 2026 |
| Rebuttal Expert Reports | July 1, 2026 |
| Mediation | July 20, 2026 |
| Dispositive Motions | Filed by August 10, 2026 |
| Trial Ready | November 10, 2026 |

Plaintiff requests that any mediation be conducted by the court, rather than a third-party.

The parties reserve their rights to request any additional orders under Rule 26.03, Rule 16.02 and 16.03 as appropriate.

Dated: 10/13/2025

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PRO SE PLAINTIFF

JOHN J. CHOI
RAMSEY COUNTY ATTORNEY

Dated: 10/13/2025

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