

3. Proposed Schedule:

All discovery must be completed by _____.

a. Initial Requests for Documents must be made by _____.

b. Depositions shall be completed by _____.

i. Neither party may take more than _____ depositions.

c. Documents from Third Parties (such as doctors) will/will not (circle one) be required. If required, the following are the Third Parties from whom the parties will request documents:

i. Subpoenas requesting documents from Third Parties must be served by _____. Any party that receives a production from a Third Party must provide a copy of that production to all other parties in this action.

d. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which each expert is expected to testify.

i. Written reports by any expert(s) must be served on the

other parties in this action by _____.
Depositions of experts must be completed by _____.

4. Early Settlement or Resolution:

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than _____. The following information is needed before settlement can be discussed:

5. Other Matters:

Plaintiff/Defendant (circle one) wishes to discuss the following additional topics at the Initial Case Management Conference.

Respectfully submitted this _____ day of _____.

Name

Counsel for _____
(if applicable)

Address

Email

Phone Number