



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. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party 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:

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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.

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- 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:

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**5. Other Matters:**

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

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Respectfully submitted this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Name

Counsel for \_\_\_\_\_  
(if applicable)

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\_\_\_\_\_  
Address

\_\_\_\_\_  
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Phone Number