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| **JUDGE ANDRÉ BIROTTE JR.**  **SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET**  *Please complete this worksheet jointly and file it with your Joint Rule 26(f) Report.*  ***The Court ORDERS the parties to make every effort to agree on dates.*** | | | | |
| **Case No.** | **Case Name:** | | | |
| **Trial and Final Pretrial Conference Dates** | | | **Plaintiff’s Proposed Date**  **mm/dd/yyyy** | **Defendant’s Proposed Date**  **mm/dd/yyyy** |
| Check one:  Jury Trial or  Court Trial  ***[Monday at 8:30 a.m., about 18 months after Complaint filed]***  Estimated Duration, in days: | | | \_\_\_ days | \_\_\_ days |
| Final Pretrial Conference (“FPTC”) [L.R. 16], Hearing on Motions In Limine  ***[Friday at 11:00 a.m., at least 17 days before trial]*** | | |  |  |
| **Event[[1]](#footnote-1)**  ***Note:*** Hearings must be on Fridays at 10:00 a.m.  Other dates can be any day of the week**.** | | **Suggest.**  **Weeks Before FPTC[[2]](#footnote-2)** | **Plaintiff’s Proposed Date**  **mm/dd/yyyy** | **Defendant’s Proposed Date**  **mm/dd/yyyy** |
| Last Date to ***Hear*** Motions to Amend Pleadings/Add Parties *[Friday]* | | 12-16 weeks after Sched. Conf. |  |  |
| Non-Expert Discovery Cut-Off  **(no later than deadline for *filing* dispositive motion)** | | 17 |  |  |
| Expert Disclosure (Initial) | |  |  |  |
| Expert Disclosure (Rebuttal) | |  |  |  |
| Expert Discovery Cut-Off | | 12[[3]](#footnote-3) |  |  |
| Last Date to ***Hear*** Motions *[Friday]*   * Rule 56 Motion due at least 5 weeks before hearing * Opposition due 2 weeks after Motion is filed * Reply due 1 week after Opposition is filed   ***For Cross-Motions, see Standing Order*.** | | 12 |  |  |
| Deadline to Complete Settlement Conference [L.R. 16-15] | | 10 |  |  |
| ***Alternative Dispute Resolution (“ADR”) Procedure (select one)***:  (Magistrate Judge *[with Court approval],* Court’s Mediation Panel, or Private Mediation) | |  | 1. Mag. Judge  2. Panel  3. Private | 1. Mag. Judge  2. Panel  3. Private |
| **Trial Filings (first round)**   * Motions In Limine * Memoranda of Contentions of Fact and Law [L.R. 16-4] * Witness Lists [L.R. 16-5] * Joint Exhibit List [L.R. 16-6.1] * Joint Status Report Regarding Settlement * Proposed Findings of Fact and Conclusions of Law [L.R. 52] *(court trial only)* * Declarations containing Direct Testimony, if ordered *(court trial only)* | | 3 minimum |  |  |
| **Trial Filings (second round)**   * Oppositions to Motions In Limine * Joint Proposed Final Pretrial Conference Order [L.R. 16-7] * Joint/Agreed Proposed Jury Instructions *(jury trial only)* * Disputed Proposed Jury Instructions *(jury trial only)* * Joint Proposed Verdict Forms *(jury trial only)* * Joint Proposed Statement of the Case *(jury trial only)* * Proposed Additional Voir Dire Questions, if any *(jury trial only)* * Evidentiary Objections to Decls. of Direct Testimony *(court trial only)* | | 2 minimum |  |  |

**[Revised March 15, 2024]**

1. **The parties may seek dates for additional events by filing a separate Stipulation and Proposed Order.**

   ***This is often* *appropriate for class actions, patent cases, and ERISA cases.*** [↑](#footnote-ref-1)
2. **This is the Court’s recommended default timeline for certain events. The parties are welcome to propose different intervals as needed for their case.** [↑](#footnote-ref-2)
3. **The parties may wish to consider cutting off expert discovery prior to the deadline for *filing* an MSJ.** [↑](#footnote-ref-3)