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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)