EXHIBIT A

PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES

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| **Matter** | **Weeks Before Trial** | **Plaintiff(s) Request** | **Defendant(s) Request** | **Court Order** |
| Motion to Amend or Add Parties | 40 |  |  |  |
| Fact Discovery Cut-Off (including filing of related motions) | 21 |  |  |  |
| Expert Disclosures | 19 |  |  |  |
| Rebuttal Expert Disclosures | 16 |  |  |  |
| Expert Discovery Cut-Off  (including filing of related motions) | 14 |  |  |  |
| Substantive Motions  10:00 a.m. (Weds.) | 13 |  |  |  |
| Last Day to Conduct  Settlement Proceedings | 12 | L.R. 16−14 Settlement Choice:  No. 1 USMJ  No. 2 Court Mediation Panel  No. 3 Private ADR  Date: \_\_\_\_\_ | L.R. 16−14 Settlement Choice:  No. 1  USMJ  No. 2 Court Mediation Panel  No. 3 Private ADR  Date: \_\_\_\_\_ | L.R. 16−14 Settlement Choice:  No. 1  USMJ  No. 2 Court Mediation Panel  No. 3 Private ADR  Date: \_\_\_\_\_ |
| Last Day to File Motions  in Limine and Daubert  Motions | 8 |  |  |  |
| Final Pretrial Conference  2:00 p.m. (Weds.) | 2 |  |  |  |
| Trial Date  9:00 a.m. (Tues.) |  | Jury  Bench  Estimated length: \_\_ days  Date: \_\_\_\_\_ | Jury  Bench  Estimated length: \_\_ days  Date: \_\_\_\_\_ | Jury  Bench  Estimated length: \_\_ days  Date: \_\_\_\_\_ |