

JOINT CASE MANAGEMENT REPORT

Description of case and issues including facts and theory of liability and/or defenses:

Pleading status:

At issue: ___yes ___no (Refer to Rule 1.440(a), Fla.R.Civ.P.)

Open motions: (list motions and date of filing)

Anticipated need for amendment of complaint, answer, or affirmative defenses:

___yes ___no

Deadline for completion of the above: _____

Status of outstanding discovery:

List date/s of exchange of discovery including interrogatories, requests to produce, document subpoenas, and requests to admit: (date propounded and date of responses)

As to each discovery: Objections filed ___yes ___no: meet and confer held (date):

Privilege raised ___yes ___no, privilege log filed (date): _____

Outstanding Discovery Issues: ___yes ___no, list motions and date of filing:

Additional interrogatories, request to produce or requests to admit planned:

___yes ___no. If yes, what form and by deadline: _____

Fact discovery:

Schedule of fact witness depositions by name and date taken or planned:

Expert Discovery:

Schedule of expert witness by name and date taken or planned:

Deadline for expert disclosure: (list dates)

Deadline for any planned examinations or inspections/or date occurred: (list by expert and date)

Deadline of exchange of expert reports/or discovery: (list dates)

Dispositive motions anticipated and a deadline and briefing schedule for such motions (list)

Mediation efforts and a deadline for mediation and the name of mediator selected (list)

Trial readiness:

Date which the parties will be ready for trial and must specify whether the trial requested was originally jury or bench.

___jury ___bench Trial ready date: _____

NO schedule proposed may exceed Florida Rule of Judicial Administration Time Standards, which provides 12 months for nonjury trials and 18 months for jury trials unless this action qualifies as a complex case under Rule 1.201, Fla.R.Civ.P.

s/Plaintiff's Counsel

s/Defense Counsel