EXHIBIT A

PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **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 Motions10:00 a.m. (Weds.) | 13 |  |  |  |
| Last Day to ConductSettlement Proceedings | 12 | L.R. 16−14 Settlement Choice: [ ]  No. 1 USMJ[ ]  No. 2 Court Mediation Panel [ ]  No. 3 Private ADRDate: \_\_\_\_\_ | L.R. 16−14 Settlement Choice: [ ]  No. 1 USMJ[ ]  No. 2 Court Mediation Panel [ ]  No. 3 Private ADRDate: \_\_\_\_\_ | L.R. 16−14 Settlement Choice: [ ]  No. 1 USMJ[ ]  No. 2 Court Mediation Panel [ ]  No. 3 Private ADRDate: \_\_\_\_\_ |
| Last Day to File Motionsin Limine and DaubertMotions | 8 |  |  |  |
| Final Pretrial Conference2:00 p.m. (Weds.) | 2 |  |  |  |
| Trial Date 9:00 a.m. (Tues.) |  | [ ]  Jury [ ]  BenchEstimated length: \_\_ daysDate: \_\_\_\_\_ | [ ]  Jury [ ]  BenchEstimated length: \_\_ daysDate: \_\_\_\_\_ | [ ]  Jury [ ]  BenchEstimated length: \_\_ daysDate: \_\_\_\_\_ |