CASE MANAGEMENT REPORT

The parties have agreed on the following dates and discovery plan pursuant to Fed. R.

Civ. P. 26(f) and M.D. Fla. R. 3.05(c):

DEADLINE OR EVENT	AGREED DATE
Mandatory Initial Disclosures (pursuant to Fed. R. Civ. P. 26(a)(1) [Court recommends 30 days after CMR meeting]	
Certificate of Interested Persons and Corporate Disclosure Statement [each party who has not previously filed must file immediately]	
Motions to Add Parties or to Amend Pleadings [Court recommends 1 - 2 months after CMR meeting]	
Disclosure of Expert Reports Plaintiff: Defendant: [Court recommends last exchange 6 months before trial and 1 - 2 months before discovery deadline to allow expert depositions]	
Discovery Deadline [Court recommends 5 months before trial to allow time for dispositive motions to be filed and decided; all discovery must be commenced in time to be completed before this date]	
Dispositive Motions, Daubert, and Markman Motions [Court requires 4 months or more before trial term begins]	

How To Make A Management Report

RM Cervero

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